

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

IN RE:

CHAPTER 7

SURROUND MEDICAL SYSTEMS, INC.

CASE NO. 24-03736-5-PWM

Debtor.

NOTICE OF TRUSTEE'S INTENT TO ABANDON PROPERTY

TO: ALL CREDITORS AND PARTIES IN INTEREST

In accordance with Rule 6007 of the Bankruptcy Rules, notice is hereby given of the proposed abandonment of the following described property which is encumbered by a valid security interest which renders the property as having insignificant equity value to the estate and/or burdensome to the estate, and/or not encumbered by any valid security interest but of insignificant equity value to the estate:

1. *All physical personal property assets, including goods, inventory, equipment, xray nano tubes, and lead lined boxes, but specifically excluding intellectual property, instruments, money, deposit accounts, prepayments and general intangibles (such physical personal property less the stated exclusions, collectively the "Abandoned Assets"). (*Scheduled value for all assets less the exclusions approximates \$207,731.000*). After a review and analysis of the potential realizable sale value of the Abandoned Assets, Mike Gurkins of Country Boys Auction and Realty has advised the Trustee that a sale of such assets would likely **not** net an amount even equal to the contract rate of rent applicable to the Debtor's office premise- approximately \$19,000 per month contract rate. Most of such physical assets are customized and specific to the patented product created by the Debtor with minimal value to or application for other parties.

*Abandoned Assets and excluded assets are subject to: UCC Financing Statement No. 20240005653J filed 1/15/2024 with North Carolina Secretary of State by BS Investors, LLC, and UCC Financing Statement No. 2024 5088750 filed 7/25/2024 with Delaware Department of State (Debtor is a Delaware corporation). Debtor's Schedules filed with the Court reflect an outstanding purported secured indebtedness of \$1,255,047.00 - pursuant to a Secured Negotiable Promissory Note dated as of January 15, 2024. Trustee believes that the validity of BS Investors, LLC's secured status is subject to potential avoidable transfer causes of action, including fraudulent transfer actions.

An objection to the proposed abandonment may be filed with the Clerk, United States Bankruptcy Court, Post Office Box 791, Raleigh, North Carolina 27602, with a copy served on the Trustee whose name appears at the bottom of this Notice, within FOURTEEN (14) DAYS of the date of the mailing of this notice. No hearing will be conducted on said objections unless the

Court, in its discretion, deems a hearing necessary, or unless a hearing is requested by the party filing such request. Any party requesting a hearing shall appear at said hearing in support of such request or he may be assessed with costs.

DATE OF NOTICE: November 8, 2024.

s/Gregory B. Crampton

Gregory B. Crampton

NC State Bar No. 991

Chapter 7 Trustee

NICHOLLS & CRAMPTON, P.A.

Post Office Box 18237

Raleigh, NC 27619

Telephone: 919-781-1311

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing **NOTICE OF TRUSTEE'S INTENT TO ABANDON PROPERTY** was served this day by CM/ECF electronic email or by placing a copy thereof in a depository under the exclusive care and custody of the United States Postal Service in a postage prepaid envelope and properly addressed as follows:

Mr. Brian Behr
Bankruptcy Administrator
434 Fayetteville Street, Suite 640
Raleigh, NC 27601

VIA CM/ECF E-MAIL SERVICE ONLY
Jason L. Hendren
Attorney for Debtor
Hendren, Redwine & Malone, PLLC
4600 Marriott Dreive
Suite 150
Raleigh, NC 27612

This the 8th day of November, 2024.

S/Gregory B. Crampton
Gregory B. Crampton
Attorney

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

IN RE:

CHAPTER 7

SURROUND MEDICAL SYSTEMS, INC.

CASE NO. 24-03736-5-PWM

Debtor.

CERTIFICATE OF MAILING

I, Gregory B. Crampton, of Nicholls & Crampton, P.A., Post Office Box 18237, Raleigh, North Carolina 27619, certify that on the 8th day of November, 2024, I served a copy of the attached **NOTICE OF TRUSTEE'S INTENT TO ABANDON PROPERTY** by CM/ECF electronic email or by placing said copies in a depository of the United States Mail, first-class postage prepaid to those parties shown on the attached Exhibit 1.

I certify under penalty of perjury that the foregoing is true and correct.

This the 8th day of November, 2024.

s/Gregory B. Crampton

Gregory B. Crampton

Attorney

NICHOLLS & CRAMPTON, P.A.

Post Office Box 18237

Raleigh, NC 27619

Telephone: 919-781-1311

EXHIBIT !

All American Relocation, Inc.
Attn: Managing Agent
5101 Trademark Drive
Raleigh, NC 27610

Dentistry Today
Attn: Managing Agent
165 Passacie Avenue, Suite 202
Fairfield, NJ 07004

Foundry Commercial
Attn: Managing Agent
2301 Sugar Bush Road, Suite 220
Raleigh, NC 27612

AT&T
Attn: Managing Agent
P.O. Box 5076
Carol Stream, IL 60197

Dr. David Landwehr, DDS
Attn: Managing Agent
2418 Crossroads Drive, Suite 2900
Madison, WI 53718

Giordano Halleran & Ciesla
Attn: Managing Agent
125 Half Mile Road, Suite 300
Red Bank, NJ 07701

Benco Dental Supply Co
Attn: Managing Agent
295 Center Point Blvd
Pittston, PA 18640

Dr. Diwakar Kinra, DDS
Attn: Managing Agent
5409 Gateway Center, Suite F
Flint, MI 48507

Henry Schein Technology
Attn: Managing Agent
Dept. CH 14200
Palatine, IL 60055

BS Investors, LLC
Attn: Managing Agent
2017 Fiesta Drive, Suite 201
Sarasota, FL 34231

Dr. Erin Elliott, DDS
Attn: Managing Agent
313 N. Spokane St
Post Falls, ID 83854

Insight
Attn: Managing Agent
PO Box 731069
Dallas, TX 75373

CadenceSEO LLC
Attn: Managing Agent
1430 S Boulder Street, Unite A
Gilbert, AZ 85296

Dr. Michael Riccobene
Attn: Managing Agent
5638 NC Highway 42, Suite 214
Garner, NC 27529

Integrated Media Services
Attn: Managing Agent
500 Craig Road, Suite 101
Manalapan, NJ 07726

Charter Communications
Attn: Managing Agent
PO Box 223085
Pittsburgh, PA 15251

Dr. Steven Hernandez, DDS
Attn: Managing Agent
8134 Sawyer Brown Rd.
Nashville, TN 37221

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101-7346

Dental Trade Alliance
Attn: Managing Agent
4350 Fairfax Drive, Suite 650
Arlington, VA 22203

Elite Dental Alliance
Attn: Managing Agent
6900 Dallas Parkway, Suite 500
Plano, TX 75024

Iron Mountain
Attn: Managing Agent
2 Sun Court
Norcross, GA 30092

Dental Whale, LLC
Attn: Managing Agent
13621 NW 12th Street, Suite 120
Fort Lauderdale, FL 33323

Endeavor Business Media
Attn: Managing Agent
PO Box 306479
Nashville, TN 37230

Kennon Craver
Attn: Managing Agent
4011 University Drive, Suite 300
Durham, NC 27707

DentalTown.com LLC
Attn: Managing Agent
9633 48th Street, Suite 200
Phoenix, AZ 85044

First Part China Ltd
No. 88 Shagand West Road
Gangkou Town, Zhongshan City
Guangdong, 528447 CN

LexisNexis
Attn: Managing Agent
28544 Network Place
Chicago, IL 60673

Maxus Plan Solution
Attn: Managing Agent
15720 Brixham Hill Avenue, Suite 30
Charlotte, NC 28277

Reynwood Communications
Attn: Managing Agent
409 South Street #1128
Eatontown, NJ 07724

Transcat
Attn: Managing Agent
30 Vantage Point Drive
Rochester, NY 14624

Murgitroyd
Attn: Managing Agent
165-169 Scotland St.
Glasgow, G5 8PL

Salesforce
Attn: Managing Agent
415 Mission Street, 3rd floor
San Francisco, CA 94105

Wake County Dept. of Revenue
Attn: Managing Agent
P.O. Box 2331
Raleigh, NC 27602

NC Department of Revenue
Attn: Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

Salesforce, Inc.
Attn: Managing Agent
415 Mission Street, 3rd Floor
San Francisco, CA 94105

Xinvisio
Attn: Managing Agent
312 Silver Creek Trail
Chapel Hill, NC 27514

NC Services for Dentistry, Inc.
Attn: Managing Agent
1600 Evans Road
Cary, NC 27513

SBP Office Owner, LP
Attn: Managing Agent
PO Box 936799
Atlanta, GA 31193-6799

Xinvisio, LLC
Attn: Managing Agent
312 Silver Creek Trl
Chapel Hill, NC 27514

NuRay
1F S. Bldk, No.6 Blding
No.1668 Huacheng Rd.,
Jintan Changzhou, Jiangsu 213200,

Southport Business Park
Attn: Managing Agent
PO Box 936799
Atlanta, GA 31193

Patterson Dental Supply Inc
Attn: Managing Agent
1031 Mendota Heights Road
Saint Paul, MN 55120

Special Springs LLC
7707 Ronda Drive
Canton, MI 48187

Phase2 Creative, LLC
Attn: Managing Agent
9208 Clint Avenue
Amarillo, TX 79119

State of NJ
Attn: Managing Agent
PO Box 929
Trenton, NJ 08646

Poskom
8th Floor, Poskom Tower
227 Sowon-Ro Deogyang-Gu, Goyang,
Gyeonggi-Do Korea

Talus
Attn: Managing Agent
2816 South Adams Street
Denver, CO 80210

PropelPLM, Inc.
Attn: Managing Agent
835 Main Street
Redwood City, CA 94063

Thunderbird Molding
Attn: Managing Agent
L-4311
Columbus, OH 43260